

# EXHIBIT 20



**“non-disclosure agreement” or any other similar agreement pertaining to his publications regarding his work on the Mariner East 2 project.**

2. All copies of your contact information for Robert Rice’s, including specifying when any piece of information was current.

**RESPONSE: See attached document Bates Stamped as NJ000069 providing Robert Rice’s contact information which was current as of July 2021.**

3. All copies of direct messages sent to PA Progress via any platform.

**RESPONSE: See attached documents Bates Stamped as NJ000021-60. By way of further response, Answering Defendant no longer has access to the PA Progress Facebook page and is, therefore, unable to screenshot the entirety of all direct message conversations. The attached screenshots were taken prior to litigation.**

4. Any contract or other writing setting forth any agreement between You and Cedar Fork Partners not already provided by Cedar Forks Partners.

**OBJECTION: Answering Defendant objects to this Request to the extent that it seeks information beyond the Mariner East 2 project. As such, any “non-disclosure agreement” not related to Mariner East 2 is not relevant to the claims or defenses and is not proportional to the needs of the case.**

**RESPONSE: None.**

5. Any and all documents which you contend support the assertions made in the video to which a link is provided in Paragraph 160 of the Second Amended Complaint.

**RESPONSE: See attached documents Bates Stamped as NJ000061-68 and <https://www.youtube.com/watch?v=YeCCzbGdbJ8> (The Bridge with Kira, Live From Camp White Pine).**

**SIANA LAW**

Date: March 1, 2022

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